



FROM: USTA

UNITED STATES
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To: ELIZABETH NIGHTINGALE		From: PAUL HART		
Co./Dept: FCC		Co: USTA		
Phone: (202) 418-2352		Phone: (202) 326-7291		
Fax: (202) 418-2345		Fax: (202) 326-7333		

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Elizabeth Nightingale
Staff Attorney
Federal Communications Commission

From: Paul Hart
Vice President - Technical Disciplines
United States Telephone Association

The following information is provided in response to your questions of July 18 relating to CC Docket No. 92-237, Administration of the North American Numbering Plan, Carrier Identification Codes (CICs):

1) *As of July 1, 1997, what percentage of your local exchange carrier (LEC) members were required to provide equal access?*

Information available to us indicates that there are approximately 24,000 equal access central offices in the United States and about 4,500 offices which are not equal access. Accordingly, we believe that approximately 83 percent (24,000/28,500) of the offices are required to provide equal access. Of the 24,000 offices that are listed as having equal access, we estimate that about 2,000 are actually remotes from host units. As you are aware, in many cases, small offices are increasingly being replaced by remotes served from host switches. Conversion of the host provides the capability to the remote location as well, and the remotes are listed as individual switching centers. We also presume that the offices that are not equal access are not because they are of a vintage that cannot be upgraded or no request for equal access has been received for those offices.

Our data has been collected on a per-switch level of detail due to the fact that requests for equal access and conversion are made on an individual switch basis, not a company basis. Our estimates are derived from information contained in the Local Exchange Routing Guide (LERG) which provides information on all switches in the network. Accordingly, we do not know what percentage of LECs were required to provide equal access.

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Elizabeth Nightingale
July 30, 1997

2) *Of those LEC members that, as of July 1, 1997, were required to provide equal access, what percentage, as of that date, had end office switches capable of recognizing four-digit carrier identification codes (CICs) and the corresponding seven-digit carrier access codes (CACs)?*

The answer to this question is not known. However, the 4-digit CIC capability is expected to be in place by Jan. 1, 1998.

3) *Of those LEC members that, as of July 1, 1997, were required to provide equal access and did not have switches capable of recognizing four-digit CICs and seven-digit CACs, what percentage will be able to convert their switches with a software upgrade and what percent will have to replace their switches, in order to recognize four-digit CICs and seven-digit CACs?*

Our understanding is that all equal access end offices will be able to be upgraded to recognize the 4-digit CICs with software upgrades.

4) *Please estimate the cost for software upgrades and for switch replacement ...*

We do not know the cost and time to upgrade each switch, but believe member companies have included such conversion in their plans to be completed before the end of the year.

5) *When did your LEC members that are required to provide equal access upgrade their end office switches to recognize interchangeable area codes (NPAs)? Did the upgrade include the four digit capability?*

The upgrade to interchangeable area codes was completed by the industry prior to the July 1, 1995 deadline. Four-digit capability was outside the scope of that upgrade.

6) *When did your LEC members that are required to provide equal access upgrade their end office switches to recognize the toll free 888 numbers? Was it the same upgrade as that for INPAs? Did the upgrade include the four digit CIC capability?*

The upgrade to recognize toll free numbers was done in accordance with the industry implementation schedule. INPA was a separate upgrade. Four-digit CIC capability was outside the scope of the upgrade to recognize toll free numbers.

Elizabeth Nightingale
July 30, 1997

7) *Of those LEC members that, as of July 1, 1997, were not required to provide equal access, what percentage do you anticipate will be required to do so as of December 31, 1997?*

The answer to this question is not known.

* * *

I hope this information is helpful. These responses are based on information currently available to USTA. In the event that I can be of any further assistance to you, please don't hesitate to let me know.

FEDERAL COMMUNICATIONS COMMISSION

**CC Docket No. 92-237
Administration of the North American Numbering Plan
Carrier Identification Codes (CICs)**

July 18, 1997

REQUEST FOR INFORMATION FROM USTA

Please note that the information we seek is intended to be relied upon for inclusion in the public record in CC Docket No. 92-237. This request will also be included in the docket. You may fax your response to Elizabeth Nightingale at (202) 418-2345 or e-mail it to her at "enightin@fcc.gov". **Please respond by Wednesday, July 23, 1997.** We will be responsible for assuring that your response is included in CC Docket No. 92-237. Thank you for your cooperation. If you have any questions, you may call Elizabeth Nightingale at (202) 418-2352.

Please answer the following questions:

- 1) As of July 1, 1997, what percentage of your local exchange carrier (LEC) members were required to provide equal access?
- 2) Of those LEC members that, as of July 1, 1997, were required to provide equal access, what percentage, as of that date, had end office switches capable of recognizing four-digit carrier identification codes (CICs) and the corresponding seven-digit carrier access codes (CACs)?
- 3) Of those LEC members that, as of July 1, 1997, were required to provide equal access and did not have switches capable of recognizing four-digit CICs and seven-digit CACs, what percentage will be able to convert their switches with a software upgrade and what percent will have to replace their switches, in order to recognize four-digit CICs and seven-digit CACs?
- 4) Please estimate the cost for software upgrades and for switch replacement.

software upgrades

an estimate of \$_____ per system.

an estimate of time per system _____.

switch replacement

an estimate of \$_____ per system.

an estimate of time per system (installation)_____.

- 5) When did your LEC members that are required to provide equal access upgrade their end office switches to recognize interchangeable area codes (INPAs)? Did the upgrade include the four digit CIC capability?
- 6) When did your LEC members that are required to provide equal access upgrade their end office switches to recognize the toll free 888 numbers? Was it the same upgrade as that for INPAs? Did the upgrade include the four digit CIC capability?
- 7) Of those LEC members that, as of July 1, 1997, were not required to provide equal access, what percentage do you anticipate will be required to do so as of December 31, 1997?